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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

K AND K PROMOTIONS, INC.,

Plaintiff,

v.

WALT DISNEY STUDIOS MOTION
PICTURES GROUP; PIXAR; and DISNEY
STORE USA, LLC,

Defendants.

Case No.: 2:20-cv-01753-JCM-NJK

**NOTICE OF CONSENT TO
DOCUMENTS BEING UNREDACTED**

Defendants WALT DISNEY STUDIOS MOTION PICTURES, PIXAR, and DISNEY STORE USA, LLC (collectively “Defendants”), by and through their attorneys of record, Greenberg Traurig, LLP, hereby provide notice of Defendants’ consent to the unredacted filing of Plaintiff’s Motion for Leave to File Second Amended Complaint (ECF No. 40) and the exhibit thereto.

On July 28, 2021, Plaintiff filed its Motion to Redact Portions of the Motion for Leave to File An Amended Complaint and Exhibit Attached Thereto (“Motion to Redact”) (ECF No. 39) and subsequently filed a redacted Motion for Leave to File Second Amended Complaint (“Motion to Amend”) (ECF No. 40). The Motion to Redact specifies that it was filed in an

1 effort to fully comply with the parties' agreement pursuant to the Stipulated Confidentiality
 2 Agreement and Protective Order ("Protective Order") (ECF No. 33) and purports to summarize
 3 unidentified documents produced by Defendants in discovery that were marked "confidential."

4 Although Defendants disagree with Plaintiff's characterization of information contained
 5 within the underlying documents,¹ Defendants consent to the Motion to Amend and its exhibit
 6 being filed in an unredacted format. However, Defendants reserve all rights relating to the
 7 confidentiality designation of the underlying documents.

8 DATED this 4th day of August, 2021.

9 **GREENBERG TRAURIG, LLP**

10
 11 /s/ Kara B. Hendricks

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 28 ¹ Notably, the underlying documents from which Plaintiff purports to have gleaned the new information
 are not identified in Plaintiff's filing by bates number and are not attached as exhibits.

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of August, 2021, a true and correct copy of the foregoing was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's EM/ECF system, and parties may access this filing through the Court's CM/ECF system.

/s/ Andrea Flintz
An Employee of Greenberg Traurig, LLP

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